

The Honorable Tana Lin

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

PLAINTIFFS,

v.

U.S. DEPARTMENT OF
TRANSPORTATION, et al.,

DEFENDANTS.

NO. 2:25-cv-00848-TL

STIPULATED MOTION FOR
PROPOSED BRIEFING SCHEDULE
AND TO EXTEND DISCOVERY
DEADLINESNOTE ON MOTION CALENDAR:
JULY 18, 2025

Pursuant to LCR 7(d)(1), LCR 7(k), and LCR 10(g), and Judge Lin's Standing Order, Section III.G, the parties submit this stipulated motion for a briefing schedule on dispositive cross-motions and to extend discovery-related deadlines.

Defendants filed the administrative record on July 7, 2025. The parties have conferred and have agreed that Plaintiffs' Complaint (Dkt. 1) presents questions of law that may be resolvable through dispositive cross-motions without the need for factual discovery. Accordingly, in the interest of efficiency, uniform deadlines, and conserving the time and resources of counsel and the Court, the parties respectfully move the Court to extend the deadlines to meet and confer under Fed. R. Civ. P. 26(f), to file initial disclosures under Fed. R. Civ. P. 26(a)(1), and to file a combined joint status report and discovery plan under Fed. R. Civ. P. 26(f), to the extent discovery is necessary, until after the Court has resolved all dispositive motions. The parties also request that the Court enter the following schedule:

STIPULATED MOTION FOR
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1. Defendants shall be relieved of any obligation to serve and file any answer to Plaintiffs' operative complaint, unless any claims remain pending after the Court has ruled on all dispositive motions, in which case Defendants shall have 30 days after the Court has resolved all dispositive motions to answer Plaintiffs' operative complaint.
2. Plaintiffs and Defendants shall file dispositive cross-motions on August 8, 2025.
3. Plaintiffs and Defendants shall have up to and including August 27, 2025, to file any responses to the opposing parties' dispositive motion(s).

The parties preserve all arguments and defenses; no party waives any argument or defense by entering into and filing this joint motion, except as expressly stated above.

A proposed order is appended to this stipulated motion pursuant to LCR 10(g).

DATED this 17th day of July 2025.

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